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August 25, 2017

VIA EMAIL AND ECFS

Lisa Griffin, Esq.
Rosemary McEnery, Esq.
A.J. DeLaurentis, Esq.
Market Disputes Resolution Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *AT&T Corp. v. Iowa Network Services, Inc.*
FCC Docket No. 17-56
Bureau ID No. EB-17-MD-001

Dear Counsel:

Counsel for AT&T Corp. (“AT&T”) writes in response to the letter submitted last evening by counsel for Iowa Network Services, Inc. d/b/a Aureon Network Services (“INS”). In that letter, INS indicated that it intends to submit in its final reply brief new material that was not previously produced in this proceeding. Not to prolong discussion on this matter, the detailed analysis set forth in Mr. Rhinehart’s supplemental declaration was the direct result of INS’s failure to produce key materials underlying the calculation of its rates until August 7, 2017, notwithstanding AT&T’s earlier requests. It should further be noted that at his deposition Mr. Schill was unable to address numerous issues relating to the computation of INS’s rates, even though he had been put forward by INS and submitted a declaration attesting to the reasonableness of those rates. Consequently, the fact that INS now finds it necessary to supplement the record with new material and additional declarations is not AT&T’s fault, but rather stems directly from deficiencies in INS’s earlier submissions.

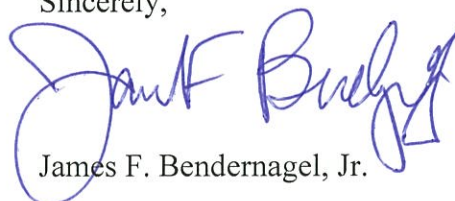
It should further be noted that AT&T did not request in its letter that the Commission rule on the objection set forth in its letter. Instead, it simply explained the basis of that objection and reserved all of its rights, including its right to move to strike from the record new material that should have been produced earlier. It also reserved the right to request further discovery and briefing depending on what INS submits.

Accordingly, there is no need for the Commission to take any action at this time.

SIDLEY

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Sincerely,

A handwritten signature in blue ink, appearing to read "James F. Bendernagel, Jr.", with a stylized, cursive script.

James F. Bendernagel, Jr.

James U. Troup, Counsel for INS
Tony S. Lee, Counsel for INS
Christopher Killion, FCC
Adam Suppes, FCC
Sandra Gray-Fields, FCC